

alamo area council of governments

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December 14, 1994

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

RE: Revision of the Commission's Rules
to ensure compatibility with
enhanced 9-1-1 Emergency Calling Systems
(cc Docket No. 94-102) Rm - 8143

Dear Sir:

The attached comments are forwarded per your Notice of Proposed Rule Making as referenced above.

These comments were recommended for approval by our Regional 9-1-1 Advisory Committee and approved by the Board of Directors of the Alamo Area Council of Governments at its meeting held on December 13, 1994.

Should you have questions, please feel free to contact me or Nolan Suarez, Regional 9-1-1 Coordinator, at (210) 225-5201.

Regionally yours,



Al J. Notzon III
Executive Director

AJN:NRS:clk

Attachment

cc: Mary Boyd
Executive Director
ACSEC

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DEC 27 1994

In the matter of
Revision of the Commission's rules
to ensure compatibility with
enhanced 911 emergency calling systems

)
) CC Docket No. 94-102
)
) RM-8143
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GENERAL

The Alamo Area Council of Governments (AACOG) is vitally interested in ensuring that Regional citizens, and those traveling in our region and throughout the State are able to obtain rapid emergency assistance through communications by dialing 9-1-1, regardless of the communications technology used to originate the emergency call.

Local units of government and public safety agencies in the AACOG Region and throughout Texas have invested vast sums in equipment, personnel, training and communications networks to facilitate emergency response through 9-1-1. A major effort has been made to use the intelligence in the communications network or in computer technology to allow the location of the calling party to be rapidly and automatically identified, even when the calling party does not know his or her location or is unable to orally communicate with the Public Safety Answering Point (PSAP).

This immense and vital effort must not be undermined or made considerably more difficult or expensive by wireless services, which are expected to become a major means of communications and will be interconnected with the landline network. The basic 9-1-1 (9-1-1) and Enhanced 9-1-1 (E9-1-1) systems in existence today have been designed to provide rapid response to calls for emergency services from landline subscribers. Existing basic 9-1-1 emergency services systems establish routing of calls to a PSAP. E9-1-1 provides added capabilities including selective routing of a call to the appropriate PSAP for quick response to emergency calls, display of calling number, address and in most cases, the name of the subscriber at the calling number. However, these systems may not address the particular and unique requirements of wireless communications environments.

The mobile nature of wireless services and the unique qualities of Radio Frequency (RF) propagation may require adaptation of existing emergency services systems and development of special location capabilities in wireless systems.

Emergency services access (9-1-1/E9-1-1) in a wireless environment needs the capability to identify the location of the radio port or cell site serving the calling party. This level of location identification will provide information to assist in routing the call to the proper PSAP and serve as a beginning point from which more precise user location capabilities can be developed, as technology and economics allow.

The wireless user may be reporting an emergency while mobile and may be some distance away from the emergency when the call is completed. The call-taker will still need to verify the caller's location. This situation exists today for the wireline 9-1-1 callers because they may be reporting from a location remote from the incident. Modifications to many of the existing emergency services systems will be necessary to provide both location and call back number.

AACOG therefore respectfully submits the following comments and requests that the FCC amend its rules to establish substantive technical and operational requirements pertaining to 9-1-1 inter-connection and location information delivery for wireless services.

GENERAL COMMENTS

1. The Commission should grant reconsideration and amend its rules to impose a substantive requirement that a single, uniform standard for delivery of the calling party's location be developed, and that the standard setting bodies consult with the National Emergency Number Association (NENA) and the Association of Public Safety Communications Officials (APCO) in developing this standard.

The FCC should explicitly require the standards setting bodies to devise a single standard, that is uniform across all wireless technologies, for delivery of calling party location information. It would be unreasonable to require local political subdivisions to expend precious resources to configure their systems to be compatible with a multitude of signalling protocols and interfaces. The Commission should impose a substantive requirement that there be one standard, transparent to all wireless technologies, that results in the delivery of location information in a format the public safety answering point can interpret and use.

2. The Commission should grant reconsideration and adopt rules that condition issuance of a license on a commitment to provide calling party location information to E9-1-1 systems in a format the local E9-1-1 system can interpret and use.

SPECIFIC COMMENTS

9-1-1 Availability

A user should have the ability to reach emergency services from any service initialized wireless handset in a home service area or subscribed-to roamed service area by dialing the three digit number 9-1-1.

Grade of Service

End to end grade of service objectives for wireless emergency access may involve several systems. Initiation of a wireless

emergency access call will involve a wireless access system. Interconnection of the caller with a public safety call taker may involve interconnecting networks and termination of the call will involve the PSAP systems. Hence an overall grade of service objective, between a person in distress and a call taker, will require a cooperative effort between these initiation, interconnection, and termination systems. Proportioning grades of service within each system to reach overall objectives will need to be agreed upon locally and comply with appropriate local regulations.

9-1-1 Call Priority

An originating 9-1-1 call should have priority over other non-emergency services calls. This priority should extend to placing the 9-1-1 call at the beginning of a queue for calls waiting to be placed, if no radio or network resources are available. Because of the unknown nature or importance of calls in progress (i.e., a call to a suicide hotline or a poison control center), this priority requirement should not be interpreted to mean preempting or "bumping" a call in progress.

User Location Information

The wireless system should have the availability to identify the location of a wireless terminal used to make a 9-1-1 call. This location information shall be used to (1) route a 9-1-1 call to the proper PSAP, based on the location of the base station to which that wireless handset is communicating and (2) provide the location of a terminal to the public safety call taker.

Re-ring/Call back

The wireless system should have the ability of the emergency services call taker to reconnect, or call back the wireless handset if the call is disconnected or terminated prior to the finalization of the event.

Telephone Devices for the Deaf (TDD) Access

The wireless system should allow disabled individuals to access emergency services through means other than traditional wireless voice handsets (i.e., a TDD-like data device for the hearing impaired, etc.). To facilitate this requirement, there should be TDD-capable wireless devices but this does not impose a requirement that all wireless devices be TDD-capable.

CONCLUSION

It is highly recommended that the FCC amend its rules to impose a substantive requirement that wireless providers transmit location information of subscribers that dial 9-1-1. Further, the Commission should, in its rules, require the standards setting bodies to work with NENA and APCO and devise a single, uniform standard for delivery of location information in a format that 9-1-1 systems can interpret and use. Also recommend that the uniform standards, when developed, ensure that minimal costs are required of 9-1-1 systems and local units of government.